

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

EDUARDO JACOBS,

Plaintiff,

Case No.:2:15-CV-10516

HON. Denise Page Hood

v.

Mag. Judge Stephanie Dawkins Davis

WAYNE COUNTY SHERIFF  
DEPUTY RAYMON ALAM,  
DETROIT POLICE OFFICER  
DAMON KIMBROUGH, DETROIT  
POLICE OFFICER MICHAEL  
KNOX, and WAYNE COUNTY  
SHERIFF DEPUTY DAVE  
WEINMAN, in their individual  
capacities, jointly and severally,

Defendants.

---

**SECOND AMENDED EXPERT WITNESS LIST BY**  
**PLAINTIFF EDUARDO JACOBS**

NOW COMES Plaintiff, Eduardo Jacobs, by and through his attorneys, HAMMOUD DAKHLALLAH & ASSOCIATES, PLLC, and hereby identifies the following expert witnesses who may be called to provide expert opinions in this case, and/or to provide rebuttal testimony to Defendants' expert witness(es):

1. Nitin V. Paranjpe, Ph.D., Thomson Econometrics & Employment Research,

2350 Franklin Rd., Ste., 200, Bloomfield Hills, Michigan 48302. Phone: (248) 292-0208. Forensic Economist/Damages Expert. Will testify as to the damages flowing from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.

2. Andrew Nay, Ph.D., C.D.M.S., C.R.C., Hostetler-Fontaine & Associates, 26211 Central Park Blvd., Ste., 501, Southfield, Michigan 48076. Phone: (248) 354-3540. Vocational Rehabilitation/Damages Expert. Will testify as Plaintiff's ability to obtain gainful employment, Plaintiff's earning capacity, lost earnings capacity, and to the damages from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.
3. Guy A. Hostetler, MA, CDMS, ABVE, ABDA, DABFC, LPC, Hostetler-Fontaine & Associates, 26211 Central Park Blvd., Ste., 501, Southfield, Michigan 48076. Phone: (248) 354-3540. Vocational Rehabilitation/Damage Expert. Will testify as Plaintiff's ability to obtain gainful employment, Plaintiff's earning capacity, lost earnings capacity, and to the damages from Defendants' wrongful actions, and as to the damages incurred as a result of Defendants' wrongful actions.
4. Brandon Giroux, Giroux Forensic Inc., Phone: (248) 762-5731. Firearms Expert. Will testify as to the operation and functionality of Plaintiff's handgun.

5. William Cousins, William J. Cousins & Associates, P.O. Box 770, Lake Orion, Michigan, 48361. Phone (248) 783-7190. Use of Force Expert. Will testify as to the Defendants' reasonableness for use of force.
6. Rebuttal experts as necessary.

Respectfully submitted,

HAMMOUD DAKHLALLAH &  
ASSOCIATES, PLLC

/s/ Kassem M. Dakhlallah

Kassem M. Dakhlallah (P70842)  
Attorney for Plaintiff  
6050 Greenfield Rd., Ste. 201  
Dearborn, MI 48126  
Ph.: (313) 581-3038  
Email: kd@hdalawgroup.com

Dated: April 24, 2019

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2019, I served a copy of the foregoing upon all counsel of record via the Court's ECF electronic filing system which will send electronic notification of this filing to all parties, and declare that this statement is true to the best of my information, knowledge, and belief.

/s/Mohamed A. Nehme

Mohamed A. Nehme  
Attorney